

GREENBERG TRAURIG, LLP  
200 Park Avenue  
New York, New York 10166  
Telephone: (212) 801-9200  
Fax: (212) 801-6400  
Bruce R. Zirinsky, Esq.  
Nancy A. Mitchell, Esq.  
Allen G. Kadish, Esq.

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

MOTORS LIQUIDATION COMPANY, *et al.*,  
f/k/a General Motors Corp., *et al.*,

Debtor.

Chapter 11

Case No. 09-50026 (REG)

Jointly Administered

**VERIFIED STATEMENT OF  
GREENBERG TRAURIG, LLP  
PURSUANT TO BANKRUPTCY RULE 2019**

Greenberg Traurig, LLP (“GT”), makes the following statements pursuant to Rule 2019 of the Federal Rules of Bankruptcy Procedure in connection with the above-captioned chapter 11 cases of Motors Liquidation Company, *et al.*, f/k/a General Motors Corp., *et al.* (collectively, the “**Debtors**”):

1. As of the date of this Statement, GT was retained by each of the entities set forth on **Exhibits A and B** (collectively, the “**Entities**”) annexed hereto in connection with the Debtors’ cases.

2. GT represents the entities listed on **Exhibit A** hereto who are holders, or are investment managers for entities who are holders (collectively, the “**Noteholders**”), of approximately \$417,497,635.80 (approximately £253,906,000) of £350,000,000 8.375% Guaranteed Notes due December 7, 2015 (the “**2015 Notes**”) and of approximately \$302,205,897.00 (approximately £183,790,000) of £250,000,000 8.875% Guaranteed Notes due

July 10, 2023 (the “**2023 Notes**” and, collectively with the 2015 Notes, the “**Notes**”) issued by General Motors Nova Scotia Finance Company (“**Finance**”) and fully and unconditionally guaranteed by Motors Liquidation Company f/k/a General Motors Corporation. Each of the Noteholders may hold claims against and/or interests in the various Debtors arising at various times out of the Notes or any related guarantee or arising from other applicable agreements, statutory and/or common law and/or equity, pursuant to their respective relationships with the Debtors. The Noteholders may also hold claims against and/or interests in the Debtors in addition to those disclosed herein that do not fall within the scope of GT’s representation of such Noteholders.

3. GT also represents the entities listed on **Exhibit B** in matters related to their potential claims against and contracts with the Debtors.

4. The specific nature and amounts of the claims held by the Entities will be determined and set forth in proofs of claim filed against the Debtors’ estates.

5. GT was retained by each of the Entities to represent them in connection with the Debtors’ chapter 11 cases.

6. GT also represents or advises, or may have represented or advised, other parties in interest with respect to these cases that have not been included in this Statement because such parties that GT represents do not currently intend to appear in these cases or such representations have been concluded. These parties in interest include suppliers, commercial and investment banks, private equity and hedge funds, other financial institutions and parties to various agreements with the Debtors.

7. GT in the past provided certain legal services to certain of the Debtors or their affiliates. Those services have concluded and GT no longer provides services to the Debtors and

their affiliates. GT will be investigating whether it possesses any claims against the Debtors in these cases. Upon information and belief, GT does not hold any equity interest in the Debtors.

8. GT reserves the right to supplement or amend this Statement in the future.

9. The undersigned declares under penalty of perjury that this Statement is true and accurate, to the best knowledge, information and belief of the undersigned.

Dated: New York, New York  
November 9, 2009

GREENBERG TRAURIG, LLP

By: /s/ Allen G. Kadish

Bruce R. Zirinsky

Nancy A. Mitchell

Allen G. Kadish

200 Park Avenue

New York, New York 10166

(212) 801-9200 (Tel)

(212) 801-6400 (Fax)

[Zirinskyb@gtlaw.com](mailto:Zirinskyb@gtlaw.com)

[Mitchelln@gtlaw.com](mailto:Mitchelln@gtlaw.com)

[Kadisha@gtlaw.com](mailto:Kadisha@gtlaw.com)

**Exhibit A**

Aurelius Capital Management, LP

Drawbridge Special Opportunities Advisors, LLC

Fortress Credit Opportunities Advisors LLC

Appaloosa Management L.P.

Elliot Associates, LP

Perry Partners, L.P.

Perry Partners International, Inc.

**Exhibit B**

Remy International, Inc.

Remy Inc.

Remy Power Products, LLC

Oxbow Carbon & Minerals LLC